

FILED

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

NOV 16 2007

CLERK
U. S. DISTRICT COURT
MIDDLE DIST. OF ALA.

UNITED STATES OF AMERICA

v.

TOMMY JORDAN

CR. NO. 2:07CR285-MHT

[18 USC 371

26 USC 7206(2)

18 USC 2]

INDICTMENT

The Grand Jury charges:

COUNT 1-CONSPIRACY

1. At all times relevant to this Indictment:

a. The defendant TOMMY JORDAN operated a tax preparation business in Montgomery, Alabama under the name Tax Tyme.

b. Felicia Jackson and Tumekia Sanders were Tax Tyme employees.

2. From at least as early as in or about January 2005 through at least as late as May 2005, the exact dates being unknown to the grand jury, in Montgomery County, in the Middle District of Alabama, and elsewhere, the defendant

TOMMY JORDAN

did conspire with Felicia Jackson, Tumekia Sanders, and others known and unknown to the grand jury to defraud the United States and an agency thereof for the purpose of impeding, impairing, obstructing, and defeating the lawful Government functions of the Internal Revenue Service ("IRS") in the ascertainment, computation, assessment, and collection of revenue, that is, income taxes.

3. In order to effect the object of the conspiracy, the defendant

TOMMY JORDAN

and his co-conspirators did a number of overt acts in the Middle District of Alabama, and elsewhere.

In particular, on or about the dates set forth below, JORDAN and his co-conspirators caused to be filed federal income tax returns for the tax year 2004, which were false and fraudulent and sought refunds well in excess of the true refund, if any, owed to the taxpayer, as follows:

Date	Taxpayer	Refund	Preparer	False Nature of Return
01/14/2005	Georgia S.	\$3,497	Jordan	1. Fabricated business income and expenses.
01/14/2005	Stanley C.	\$4,300	Jordan	1. Overstated income.
01/14/2005	Curtis F.	\$4,300	Jordan	1. Overstated income.
01/14/2005	Henry R.	\$2,604	Jordan	1. Overstated income.
02/07/2005	Shenika D.	\$4,769	Sanders	1. Fabricated business income and expenses.
02/07/2005	Ronda C.	\$4,642	Jackson	1. Overstated income.
02/07/2005	Teresa D.	\$5,505	Sanders	1. Fabricated business income and expenses.
02/14/2005	Frank M.	\$4,783	Jackson	1. Overstated income.
02/14/2005	Maranda C.	\$4,300	Sanders	1. Filed without authority of taxpayer. 2. Overstated income. 3. Falsely claimed dependents.
02/14/2005	Harvey B.	\$5,465	Jackson	1. Fabricated business income and expenses. 2. Falsely claimed dependent.
02/14/2005	Sandrill Z.	\$4,730	Jackson and Jordan	1. Overstated income.
02/14/2005	Monico H.	\$2,604	Jordan	1. Overstated income.

Date	Taxpayer	Refund	Preparer	False Nature of Return
02/14/2005	Roderick H.	\$4,300	Sanders	1. Filed without authority of taxpayer. 2. Overstated income. 3. Falsely claimed dependents.
02/14/2005	Arnola F.	\$4,300	Jackson	1. Filed without authority of taxpayer. 2. Overstated income. 3. Falsely claimed dependents.
02/14/2005	Torey H.	\$4,300	Sanders	1. Overstated income.
02/18/2005	Mary C.	\$5,358	Jordan	1. Fabricated business income and expenses.
02/21/2005	Clyde D.	\$4,780	Sanders	1. Overstated income. 2. Falsely claimed dependents.
02/21/2005	Ethel J.	\$5,348	Jackson	1. Overstated income. 2. Falsely claimed dependents.
02/21/2005	Shirley V.	\$4,300	Jackson	1. Filed without authority of taxpayer. 2. Overstated income. 3. Falsely claimed dependents.
02/28/2005	Felicia J.	\$4,300	Sanders	1. Filed without authority of taxpayer. 2. Overstated income. 3. Falsely claimed dependents.
02/28/2005	Neil W.	\$4,300	Jackson	1. Filed without authority of taxpayer. 2. Overstated income. 3. Falsely claimed dependents.
03/07/2005	Tiffeany F.	\$4,986	Sanders	1. Overstated income.
03/07/2005	Jasmine F.	\$3,136	Sanders	1. Overstated income.
03/07/2005	Samantha R.	\$2,942	Jordan	1. Overstated income.
05/16/2005	Lucille B.	\$2,604	Jackson	1. Filed without authority of taxpayer. 2. Overstated income. 3. Falsely claimed dependents.

Date	Taxpayer	Refund	Preparer	False Nature of Return
05/23/2005	Gertrude W.	\$2,604	Jordan	1. Filed without authority of taxpayer. 2. Overstated income. 3. Falsely claimed dependents.

All in violation of Title 18, United States Code, Section 371.

COUNTS 2-27-AIDING FILING OF FALSE TAX RETURN

1. The allegations set forth in paragraphs 1 through 3 of Count 1 of this Indictment are hereby realleged as if set forth herein.

2. On or about the dates set forth below, in the Middle District of Alabama, and elsewhere, the defendant

TOMMY JORDAN

while aiding and abetting and being aided and abetted by Felicia Jackson, Tumekia Sanders, and others known and unknown to the grand jury, did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service, of U.S. Individual Income Tax Returns, Forms 1040 and 1040A for the calendar year 2004, for the taxpayers set forth below, which were false and fraudulent as to material matters as described below, which caused and attempted to cause the IRS to pay refunds in the amounts described below, which the taxpayers either were not entitled to at all, or which were in an amount significantly in excess of the amount they were entitled to, as described below:

Count	Date	Taxpayer	Refund	Preparer	False Nature of Return
2.	01/14/2005	Georgia S.	\$3,497	Jordan	1. Fabricated business income and expenses.
3.	01/14/2005	Stanley C.	\$4,300	Jordan	1. Overstated income.


Count	Date	Taxpayer	Refund	Preparer	False Nature of Return
4.	01/14/2005	Curtis F.	\$4,300	Jordan	1. Overstated income.
5.	01/14/2005	Henry R.	\$2,604	Jordan	1. Overstated income.
6.	02/07/2005	Shenika D.	\$4,769	Sanders	1. Fabricated business income and expenses.
7.	02/07/2005	Ronda C.	\$4,642	Jackson	1. Overstated income.
8.	02/07/2005	Teresa D.	\$5,505	Sanders	1. Fabricated business income and expenses.
9.	02/14/2005	Frank M.	\$4,783	Jackson	1. Overstated income.
10.	02/14/2005	Maranda C.	\$4,300	Sanders	1. Filed without authority of taxpayer. 2. Overstated income. 3. Falsely claimed dependents.
11.	02/14/2005	Harvey B.	\$5,465	Jackson	1. Fabricated business income and expenses. 2. Falsely claimed dependent.
12.	02/14/2005	Sandrill Z.	\$4,730	Jackson and Jordan	1. Overstated income.
13.	02/14/2005	Monico H.	\$2,604	Jordan	1. Overstated income.
14.	02/14/2005	Roderick H.	\$4,300	Sanders	1. Filed without authority of taxpayer. 2. Overstated income. 3. Falsely claimed dependents.
15.	02/14/2005	Arnola F.	\$4,300	Jackson	1. Filed without authority of taxpayer. 2. Overstated income. 3. Falsely claimed dependents.
16.	02/14/2005	Torey H.	\$4,300	Sanders	1. Overstated income.
17.	02/18/2005	Mary C.	\$5,358	Jordan	1. Fabricated business income and expenses.

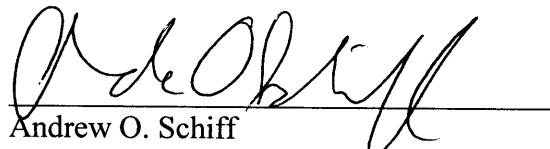
Count	Date	Taxpayer	Refund	Preparer	False Nature of Return
18.	02/21/2005	Clyde D.	\$4,780	Sanders	1. Overstated income. 2. Falsely claimed dependents.
19.	02/21/2005	Ethel J.	\$5,348	Jackson	1. Overstated income. 2. Falsely claimed dependents.
20.	02/21/2005	Shirley V.	\$4,300	Jackson	1. Filed without authority of taxpayer. 2. Overstated income. 3. Falsely claimed dependents.
21.	02/28/2005	Felicia J.	\$4,300	Sanders	1. Filed without authority of taxpayer. 2. Overstated income. 3. Falsely claimed dependents.
22.	02/28/2005	Neil W.	\$4,300	Jackson	1. Filed without authority of taxpayer. 2. Overstated income. 3. Falsely claimed dependents.
23.	03/07/2005	Tiffeany F.	\$4,986	Sanders	1. Overstated income.
24.	03/07/2005	Jasmine F.	\$3,136	Sanders	1. Overstated income.
25.	03/07/2005	Samantha R.	\$2,942	Jordan	1. Overstated income.
26.	05/16/2005	Lucille B.	\$2,604	Jackson	1. Filed without authority of taxpayer. 2. Overstated income. 3. Falsely claimed dependents.
27.	05/23/2005	Gertrude W.	\$2,604	Jordan	1. Filed without authority of taxpayer. 2. Overstated income. 3. Falsely claimed dependents.

All in violation of Title 26, United States Code, Section 7206(2) and Title 18, United States Code, Section 2.

A TRUE BILL:


Foreperson


LEURA G. CANARY
United States Attorney


Andrew O. Schiff
Assistant United States Attorney